Arthur Neal National Organic Program USDA -AMS-NOP August 16, 2005

Comment on Docket TM-04-07 NOP Sunset Review

"Potassium tartrate made from tartaric acid" should be removed from the National List at 205.605(b). This substance is improperly identified, and is not a substance approved for food use by FDA. NOSB commissioned one TAP review in 1995 on "potassium" tartrate" and the review intent was to consider the substance known as "cream of tartar" which is properly known as potassium acid tartrate. There was only one vote, to approve "Potassium acid tartrate (or potassium tartrate made from tartaric acid)" Potassium acid tartrate and tartaric acid, are both on the National List, and should remain on the National List. It is not necessary to retain potassium tartrate made from tartaric acid, as these substances are the ones used in food handling.

Potassium tartrate synonyms include: Dipotassium tartrate; Butanedioic acid, 2,3dihydroxy-, [R-(R\*,R\*)]-, dipotassium salt; Potassium tartarate; CAS # 921-53-9

The Merck Index lists that potassium tartrate, C<sub>4</sub>H<sub>4</sub>K<sub>2</sub>O<sub>6</sub> a/k/a Soluble Tartar, is used as a cathartic, but doesn't appear to have any food uses.

A search of 2CFR, and EAFUS (Everything allowed in Food in the US, a FDA database found no specific FDA reference for potassium tartrate or dipotassium tartarate.

This substance should be removed as a technical error in the early nomenclature

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